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7 *Attorney(s) for Display Technologies, LLC*

8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10 **DISPLAY TECHNOLOGIES, LLC,**

11 *Plaintiff,*

12 v.

13 **BOSS INTERNATIONAL GROUP,**
14 **INC. d/b/a PLANET AUDIO**
15 **SYSTEMS,**

16 *Defendant.*

CASE NO. 2:22-cv-02681

COMPLAINT FOR PATENT
INFRINGEMENT

DEMAND FOR JURY TRIAL

17
18 Plaintiff Display Technologies, LLC (“Plaintiff” or “Display”) files this
19 Complaint against BOSS International Group, Inc. (“Defendant” or “Planet Audio”)
20 for infringement of United States Patent No. 9,300,723 (the “ ‘723 Patent”).

21 **PARTIES AND JURISDICTION**

22 1. This is an action for patent infringement under Title 35 of the United
23 States Code. Plaintiff is seeking injunctive relief as well as damages.

24 2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331
25 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent
26 infringement arising under the United States patent statutes.

27 3. Plaintiff is a Texas limited liability company with an address of 1 East
28 Broward Boulevard, Suite 700, Ft. Lauderdale, FL 33301.

1 4. On information and belief, Defendant is a Delaware corporation with a
2 principal place of business at 3451 Lunar Court, Oxnard CA 93030. On information
3 and belief, Defendant may be served through its agent, The Corporation Trust
4 Company, Corporation Trust Center, 1209 Orange St, Wilmington, DE 19801.

5 5. This Court has personal jurisdiction over Defendant because Defendant
6 has committed, and continues to commit, acts of infringement in this District, has
7 conducted business in this District, and/or has engaged in continuous and systematic
8 activities in this District.

9 6. Upon information and belief, Defendant's instrumentalities that are
10 alleged herein to infringe were and continue to be used, imported, offered for sale,
11 and/or sold in this District.

12 **VENUE**

13 7. On information and belief, venue is proper in this District under 28
14 U.S.C. § 1400(b) because Defendant is a resident of this District. Alternatively, acts
15 of infringement are occurring in this District and Defendant has a regular and
16 established place of business in this District.

17 **COUNT I**

18 **(INFRINGEMENT OF UNITED STATES PATENT NO. 9,300,723)**

19 8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

20 9. This cause of action arises under the patent laws of the United States
21 and, in particular, under 35 U.S.C. §§ 271, *et seq.*

22 10. Plaintiff is the owner by assignment of the '723 Patent with sole rights
23 to enforce the '723 Patent and sue infringers.

24 11. A copy of the '723 Patent, titled "Enabling social interactive wireless
25 communications," is attached hereto as Exhibit A.

26 12. The '723 Patent is valid, enforceable, and was duly issued in full
27 compliance with Title 35 of the United States Code.

28 13. Defendant has infringed and continues to infringe one or more claims,

1 including at least Claim 12 of the '723 Patent by making, using, and/or selling media
 2 systems covered by one or more claims of the '723 Patent. For example, Defendant
 3 makes, uses, and/or sells the Planet Audio car stereo, associated software, hardware
 4 and/or apps, and any similar products ("Product"). Defendant has infringed and
 5 continues to infringe the '723 Patent in violation of 35 U.S.C. § 271.

6 14. Regarding Claim 12, the Product is a media system through which a user
 7 can view a media file (e.g. camera photos) from a camera, through a media terminal
 8 (e.g., smartphone) from a media node (e.g., Bluetooth server) over a communication
 9 network (e.g. Bluetooth network) through a communication link (wireless
 10 communication). Certain aspects of this element are illustrated in the screenshots
 11 below and/or those provided in connection with other allegations herein.



◇ Bluetooth Hands Free Bluetooth Audio Streaming. Make and receive calls, play and control music and apps like Spotify/Pandora wirelessly

Source: <https://planetaudio.com/product/p9640b/>

Audio Streaming

Audio streaming [A2DP] is an audio protocol of Bluetooth technology. This profile allows for audio to be streamed wirelessly from your compatible device, such as a Smartphone, to the source unit so you can enjoy your favorite music or streaming music service such as Pandora or Spotify, wirelessly.

Source: <https://planetaudio.com/product/p9640b/>

Bluetooth

Allows our Bluetooth equipped source units to make wireless hands-free calls when paired with a Bluetooth equipped Smartphone. Communicate via the built in microphone on most of our units [or external microphone if provided] and listen thru your car's speakers.

Source: <https://planetaudio.com/product/p9640b/>

15. The Product includes at least one media terminal disposed in an accessible relation to at least one interactive computer network. For example, the Bluetooth network is used to play music and video from mobile. Certain aspects of this element are illustrated in the screenshots below and/or in those provided in connection with other allegations herein.

Audio Streaming

Audio streaming [A2DP] is an audio protocol of Bluetooth technology. This profile allows for audio to be streamed wirelessly from your compatible device, such as a Smartphone, to the source unit so you can enjoy your favorite music or streaming music service such as Pandora or Spotify, wirelessly.

Source: <https://planetaudio.com/product/p9640b/>

(A2DP) Music Mode

Tap music button to listen music in bluetooth mode.

Tap the button for 'music' in bluetooth main menu.

You can select the function with the key for previous, play / pause, stop, and next.

A2DP(Advanced Audio Distribution Profile) Music Player
A2DP is a function which can receive the audio frequency signal from the mobile phone, amplified by the car audio and played out by the car speakers.

Notice: your mobile phone need to support A2DP.

Tap the buttons on the screen as shown, or press corresponding buttons (pause/play, stop, previous/next) on remote control to play, pause, play previous, or next music file.




Source: https://planetaudio.com/manuals/P9640B_EN_UM_V2.PDF


16. A wireless range is structured to permit authorized access to the at least one interactive computer network. For example, the mobile phone is connected with the car stereo through a Bluetooth authorized access (e.g. via pairing Bluetooth) that permits the connection of the mobile by the wireless network (interactive computer network).

Bluetooth Operation

Warning: Driving and having a telephone conversation at the same time is dangerous, please park your car before having a telephone conversation. The supplier waves any and all liability when this warning is not followed.

To enter bluetooth mode, you can tap bluetooth icon on main menu or long press the mute/bluetooth button on the remote control or press mode button on remote.

Tap  calling button to use phone functions.

Tap  music button to start bluetooth music player.

Pairing Mode

At the 1st time when using bluetooth, you need to pair the mobile phone first.

When a phone has not been paired with the unit, the BT icon and pairing mark will blink continually on the panel.

When the unit have connect with phone, the BT icon will turn on and the mobile phone name (if available) will be display on the panel.

According to mobile pairing device manual, after searching new device (BT friendly name: Planet Audio P9640B) select it, input password "0000" and confirm ok, device paring is finished.

The phone name will available on the panel after the pairing is completed. It means device is connected and ready for bluetooth communication.




Source: https://planetaudio.com/manuals/P9640B_EN_UM_V2.PDF

17. At least one media node is disposable within the wireless range, wherein the at least one media node is detectable by the at least one media terminal. For example, the media node (connecting Car stereo) sends Bluetooth signals, which are detected by the mobile phone (at least one media terminal) when the mobile phone is paired with Bluetooth. Certain aspects of this element are illustrated in the screenshots below and/or those provided in connection with other allegations herein.

Bluetooth Operation

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When the unit have connect with phone, the BT icon will turn on and the mobile phone name (if available) will be display on the panel.

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18. At least one digital media file is initially disposed on at least one of the at least one media terminal or the at least one media node and the at least one media terminal is structured to detect the at least one media node disposed within the wireless range. For example, the mobile (media terminal) is connected with the car stereo through a Bluetooth when the mobile comes within range (wireless) of the Bluetooth signals.

Bluetooth Operation

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Pairing Mode

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When a phone has not been paired with the unit, the BT icon and pairing mark will blink continually on the panel.


When the unit have connect with phone, the BT icon will turn on and the mobile phone name (if available) will be display on the panel.

According to mobile pairing device manual, after searching new device (BT friendly name: Planet Audio P9640B) select it, input password "0000" and confirm ok, device paring is finished.

The phone name will available on the panel after the pairing is completed. It means device is connected and ready for bluetooth communication.

Auto-connect - Disconnect

When power on the unit, the last paired phone will be connected to the device via Bluetooth

automatically, it can keep five phone names in the unit. Tap  will delete from the first paired phone. if you want to disconnect the bluetooth connection, turn off the mobile phone Bluetooth function or tap the phone name in the list , and tap phone name again it will be connected again.



Source: https://planetaudio.com/manuals/P9640B_EN_UM_V2.PDF

19. A communication link is structured to dispose the at least one media terminal and the at least one media node in a communicative relation with one another via the at least one interactive computer network. For example, the mobile (media terminal) connects when the Car Stereo (i.e. media node) comes to the Bluetooth range detected by mobile (at least one media terminal) through a Bluetooth network (interactive computer network).

Audio Streaming

Audio streaming [A2DP] is an audio protocol of Bluetooth technology. This profile allows for audio to be streamed wirelessly from your compatible device, such as a Smartphone, to the source unit so you can enjoy your favorite music or streaming music service such as Pandora or Spotify, wirelessly.

Source: <https://planetaudio.com/product/p9640b/>

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Tap the button for 'music' in bluetooth main menu.

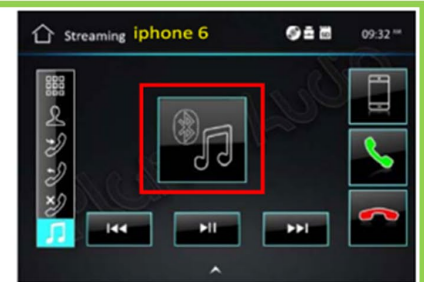
You can select the function with the key for previous, play / pause, stop, and next.

A2DP(Advanced Audio Distribution Profile) Music Player

A2DP is a function which can receive the audio frequency signal from the mobile phone, amplified by the car audio and played out by the car speakers.

Notice: your mobile phone need to support A2DP.

Tap the buttons on the screen as shown, or press corresponding buttons (pause/play, stop, previous/next) on remote control to play, pause, play previous, or next music file.



Source: https://planetaudio.com/manuals/P9640B_EN_UM_V2.PDF

20. The communication link is initiated by the at least one media terminal. For example, the communication link, i.e. Bluetooth network, which is the link between mobile and the Car Stereo (i.e. media node) whenever the Car Stereo (i.e. media node) comes to Bluetooth range of mobile (at least one media terminal).

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Pairing Mode

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According to mobile pairing device manual, after searching new device (BT friendly name: Planet Audio P9640B) select it, input password "0000" and confirm ok, device paring is finished.

The phone name will available on the panel after the pairing is completed. It means device is connected and ready for bluetooth communication.

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When power on the unit, the last paired phone will be connected to the device via Bluetooth

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21. The at least one media node and the at least one media terminal are structured to transmit the at least one digital media file there between via the communication link. For example, the mobile phone is connected with the Car Stereo through a Bluetooth network (media node) when the mobile phone (media terminal) is within the Bluetooth range.

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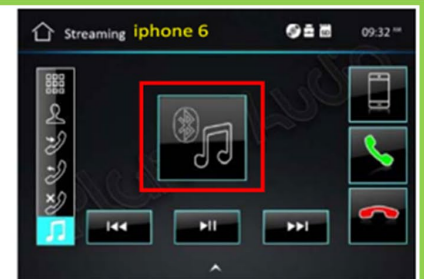
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22. The communication link is structured to bypass at least one media terminal security measure for a limited permissible use of the communication link by the media node to only transferring the at least one digital media file to, and displaying the at least one digital media file on, the at least one media terminal. For example, Car infotainment system is linked through a Bluetooth (i.e. media terminal security) when the mobile is within range (wireless) of the Bluetooth signals.

Bluetooth Operation

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23. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

24. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

25. Plaintiff is in compliance with 35 U.S.C. § 287.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No.

1 9,300,723 (or, in the alternative, awarding Plaintiff running royalties from the time of
2 judgment going forward);

3 (c) Award Plaintiff damages resulting from Defendant's infringement in
4 accordance with 35 U.S.C. § 284;

5 (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

6 (e) Award Plaintiff such further relief to which the Court finds Plaintiff
7 entitled under law or equity.

8 **JURY DEMAND**

9 Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully
10 requests a trial by jury on all issues so triable.

11
12 Dated: April 21, 2022

Respectfully submitted,

13 /s/Stephen M. Lobbin

14 ***Attorney(s) for Plaintiff***